

1 WILLIAM A. ISAACSON (*Pro hac vice*)
(wisaacson@bsfllp.com)
2 STACEY K. GRIGSBY (*Pro hac vice*)
(sgrigsby@bsfllp.com)
3 NICHOLAS WIDNELL (*Pro hac vice*)
(nwidnell@bsfllp.com)
4 BOIES SCHILLER FLEXNER LLP
1401 New York Avenue, NW
5 Washington, DC 20005
Tel: (202) 237-2727; Fax: (202) 237-6131
6

7 RICHARD J. POCKER #3568
(rpocker@bsfllp.com)
8 BOIES SCHILLER FLEXNER LLP
300 South Fourth Street, Suite 800
Las Vegas, Nevada 89101
9 Tel: (702) 382-7300; Fax: (702) 382-2755

10 DONALD J. CAMPBELL #1216
(djcc@campbellandwilliams.com)
11 J. COLBY WILLIAMS #5549
(jcw@campbellandwilliams.com)
12 CAMPBELL & WILLIAMS
700 South 7th Street
13 Las Vegas, Nevada 89101
Tel: (702) 382-5222; Fax: (702) 382-0540
14

15 *Attorneys for Defendant Zuffa, LLC, d/b/a*
Ultimate Fighting Championship and UFC
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17 **UNITED STATES DISTRICT COURT**

18 **DISTRICT OF NEVADA**

19 Cung Le, Nathan Quarry, Jon Fitch, Brandon
20 Vera, Luis Javier Vazquez, and Kyle Kingsbury,
on behalf of themselves and all others similarly
21 situated,

22 Plaintiffs,

23 v.

24 Zuffa, LLC, d/b/a Ultimate Fighting
Championship and UFC,

25
26 Defendant.
27
28

No.: 2:15-cv-01045-RFB-(PAL)

**DECLARATION OF NICHOLAS A.
WIDNELL IN SUPPORT OF ZUFFA,
LLC'S MOTION TO EXCLUDE THE
TESTIMONY OF PLAINTIFFS'
EXPERT GUY A. DAVIS UNDER
FED. R. EVID. 702 AND DAUBERT**

1 I, Nicholas A. Widnell, declare as follows:

2 1. I am a member in good standing of the bar of the District of Columbia. I am
3 admitted *pro hac vice* to practice before this Court. I am a Partner in the law firm Boies Schiller
4 Flexner LLP (“BSF”), counsel for Zuffa, LLC (“Zuffa”) in the above captioned action in the U.S.
5 District Court for the District of Nevada, *Le et al. v. Zuffa, LLC*, No. 2:15-cv-01045-RFP-PAL.

6 2. I make this declaration in support of Zuffa’s Motion to Exclude the Testimony of
7 Plaintiffs’ Expert Guy A. Davis (the “Motion”).

8 3. Based on my review of the files, records, and communications in this case, I have
9 personal knowledge of the facts set forth in this Declaration and, if called to testify, could and would
10 testify competently to those facts under oath.

11 4. Attached as Exhibit 1 is a true and correct copy of the expert opening report of Guy
12 A. Davis, dated August 31, 2017.

13 5. Attached as Exhibit 2 is a true and correct copy of excerpted pages from the transcript
14 of the first deposition of Guy A. Davis, dated September 19, 2017.

15 6. Attached as Exhibit 3 is a true and correct copy of the expert rebuttal report of Guy A.
16 Davis, dated January 12, 2018.

17 7. Attached as Exhibit 4 is a true and correct copy of excerpted pages from the transcript
18 of the second deposition of Guy A. Davis, dated January 30, 2018.

19 8. Attached as Exhibit 5 is a true and correct copy of the expert opposition report of
20 Zuffa’s expert Elizabeth Kroger Davis, dated October 27, 2017.

21 9. The only modifications to these documents are redactions for confidentiality in the
22 versions filed on the public docket and red boxes used to highlight material cited in the Motion.

23
24 I declare under penalty of perjury under the laws of the United States of America that the
25 foregoing facts are true and correct. Executed this 16th day of February, 2018 in Washington, DC.

26 /s/ Nicholas A. Widnell

27 Nicholas A. Widnell